

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

AUGUST WILDMAN, *et al.*,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT,  
DEUTSCHE BANK TRUST COMPANY  
AMERICAS, STANDARD CHARTERED BANK,  
STANDARD CHARTERED PLC, STANDARD  
CHARTERED BANK (PAKISTAN) LIMITED,  
DANSKE BANK A/S, DANSKE MARKETS INC.,  
PLACID NK CORPORATION d/b/a PLACID  
EXPRESS, and WALL STREET EXCHANGE LLC,

Defendants.

**21 Civ. 4400 (HG) (RML)**

**ORAL ARGUMENT  
REQUESTED**

**NOTICE OF DEFENDANT WALL STREET EXCHANGE LLC'S  
MOTION TO DISMISS THE AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that, Defendant Wall Street Exchange LLC (“WSE”)<sup>1</sup>, will move this Court, before the Honorable Hector Gonzalez of the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Room 6A South, Brooklyn, NY 11201, for an Order pursuant to Fed. R. Civ. P. 8(a), 12(b)(2), 12(b)(5), and 12(b)(6), dismissing with respect to WSE the amended complaint, with prejudice, for (i) insufficient service of process; (ii) lack of personal jurisdiction over WSE; and (iii) failure to state a claim on which relief can be granted. In support of its Motion to Dismiss the Amended Complaint, WSE submits a Memorandum of Law, dated November 1, 2022, the Declaration of Dr. Faraj A. Ahnish, with accompanying exhibits, and the Declaration of Amit Kumar Choudhary.

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<sup>1</sup> The Amended Complaint refers to Wall Street Exchange LLC, however; the correct name is Wall Street Exchange Centre LLC.

WSE respectfully requests oral argument on its Motion to Dismiss. Pursuant to the Court's Order on October 4, 2022, opposition papers, if any, must be served by November 29, 2022, and reply papers must be served by December 9, 2022.

Dated: New York, New York  
November 1, 2022

Respectfully Submitted,

**AKIN GUMP STRAUSS HAUER & FELD LLP**

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